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Attorney for Defendant  
CARLOS LEE SANCHEZ, Jr.

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

RICKY LEE WARE, et al.,  
Defendants.

CASE NO. 2:24-CR-00281-DAD

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: February 24, 2025

TIME: 9:30 a.m.

COURT: Hon. Dale A. Drozd

The United States of America through its undersigned counsel, Nicholas M. Fogg, Assistant United States Attorney, together with counsel for defendant Ricky Lee Ware, Linda M. Parisi, Esq., counsel for defendant Kimberly Ann Wallace, Candice L. Fields, Esq., and, counsel for defendant Carlos Lee Sanchez, Jr., John R. Manning, Esq., hereby stipulate the following:

1. By previous order, this matter was set for status conference on December 3, 2024.
2. By this stipulation, the defendants now move to continue the matter until February 24, 2025, and to exclude time between December 3, 2024, and February 24, 2025, under Local Code T-4 (to allow defense counsel time to prepare). The parties agree and stipulate, and request the Court find the following:
  - a. The United States has not yet provided discovery in this matter. However, the parties have negotiated protective orders (two of three have been filed and approved by the court, the third is pending the court's approval), clearing the way for the production of discovery by the government. The government has indicated the discovery is voluminous

1 and includes (but is not limited to) a variety of records, reports, interviews and a  
2 significant volume of ATM photos and videos. Additionally, the government seized 32  
3 electronic devices from the defendants as well as accessing social media accounts of the  
4 defendants. Counsel for the defendants will need additional time to review and analyze  
5 the discovery (once it is produced), conduct investigation, and interview potential  
6 witnesses related to the discovery production(s).

7 b. Counsel for the defendants believe the failure to grant a continuance in this case would  
8 deny defense counsel reasonable time necessary for effective preparation, taking into  
9 account the exercise of due diligence.

10 c. The government does not object to the continuance.

11 d. Based on the above-stated findings, the ends of justice served by granting the requested  
12 continuance outweigh the best interests of the public and the defendants in a speedy trial  
13 within the original date prescribed by the Speedy Trial Act.

14 e. For the purpose of commuting time under the Speedy Trial Act, 18 United States Code  
15 Section 3161 (h) (7) (A) within which trial must commence, the time period of December  
16 3, 2024, to February 24, 2025, inclusive, is deemed excludable pursuant to 18 United  
17 States Code Section 3161 (h) (7) (A), (B) (iv), corresponding to Local Code T-4 because  
18 it results from a continuance granted by the Court at the defendants' request on the basis  
19 of the Court's finding the ends of justice served by taking such action outweigh the best  
20 interest of the public and the defendant in a speedy trial.

21 2. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
22 Speedy Trial Act dictate that additional time periods are excludable from the period within  
23 which a trial must commence.

24  
25 IT IS SO STIPULATED.

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1 Dated: November 26, 2024

/S/ Linda M. Parisi

LINDA M. PARISI  
Attorney for Defendant  
Ricky Lee Ware

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4 Dated: November 26, 2024

/S/ Candice L. Fields

CANDICE L. FIELDS  
Attorney for Defendant  
Kimberly Ann Wallace

5  
6  
7 Dated: November 26, 2024

/S/ John R. Manning

JOHN R. MANNING  
Attorney for Defendant  
Carlos Lee Sanchez, Jr.

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10  
11 Dated: November 26, 2024

Phillip A. Talbert  
United States Attorney

/S/ Nicholas M. Fogg

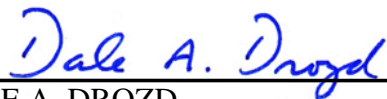
NICHOLAS M. FOGG  
Assistant United States Attorney

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15  
16 **FINDINGS AND ORDER**

17 The Court, having received, read, and considered the stipulation of the parties, and good cause  
18 appearing therefrom, adopts the stipulation of the parties in its entirety as its order. The December 3,  
19 2024 status conference is continued to February 24, 2025, at 9:30 a.m. and time is excluded between  
20 December 3, 2024, and February 24, 2025, under Local Code T-4.

21 IT IS SO ORDERED.

22 Dated: November 26, 2024

  
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DALE A. DROZD  
UNITED STATES DISTRICT JUDGE